

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**KATHLEEN D. BOGGS, on behalf of
herself and all other plaintiffs, known
and unknown,**

Plaintiff,

V.

BROWN PRINTING COMPANY

Defendant.

No. 08 CV 1985

Chief Judge Holderman

Magistrate Judge Valdez

MOTION TO DISMISS (COMBINED) AND IN THE ALTERNATIVE TO TRANSFER

Defendant Brown Printing Company (“Brown”), pursuant to Fed. R. Civ. P. 12(b)(3), 12(b)(6), and 12(g), and 28 U.S.C. §§ 93 and 1406 moves this Court to enter an order dismissing the Complaint filed by Kathleen D. Boggs (“Boggs”). As an alternative to dismissing the lawsuit under Fed. R. Civ. P. 12(b)(3) and 28 U.S.C. §§ 93 and 1406, Brown, pursuant to 28 U.S.C. § 1404, moves this Court to transfer this Lawsuit to the Western Division of the United States District Court for the Northern District of Illinois.

Dated: June 9, 2008

BROWN PRINTING COMPANY

By: /s/ Paul Patten
Paul Patten

Cathryn E. Albrecht
Paul Patten
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CERTIFICATE OF SERVICE

I, Paul Patten, an attorney, certify that on this 9th day of June, 2008, a true and correct copy of the foregoing Motion to Dismiss (Combined) and in the Alternative to Transfer was served via the electronic filing system of the United States District Court for the Northern District of Illinois upon the following:

John W. Billhorn
Billhorn Law Firm
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Chicago, IL 60610

/s/ Paul Patten
Paul Patten